

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

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|-----------------|---|-----------------------|
| In re: |) | |
| |) | |
| HASSAN M. AHMAD |) | |
| Debtor |) | Case No. 14-14380-RGM |
| |) | Chapter 13 |

CREDITOR'S OBJECTION TO CONFIRMATION
OF DEBTOR'S PROPOSED AMENDED CHAPTER 13 PLAN
AND NOTICE OF SCHEDULED HEARING ON THIS OBJECTION

Shamsiya Shervani, a creditor of the Debtor herein, objects to the confirmation of the Debtor's proposed Chapter 13 Plan filed March 11, 2015, and in support thereof states as follows:

1. Creditor incorporates herein the objections of the Trustee.
2. The Plan makes no provision for the payment of Creditor.
3. The Debtor also has not fully disclosed his income or accurately stated his expenses.
4. The debtor has failed to keep or to preserve sufficient documentation, including books, documents, records, and papers, from which the Debtor's financial condition or business transactions might be ascertained.
5. Creditor conducted a 2004 Examination of the Debtor on March 31, 2015. Preparatory to that exam, Debtor was required to produce documentation evidencing, *inter alia*, the income and expenses of his solo law practice for 2013 to date. Debtor claimed that he did not utilize any form of accounting software for his firm and thus had no accounting records to document his income and expenses beyond the bank statements for the firm's account; for 2014, Debtor had only his self-prepared "spreadsheet" of what he contended by category was his income and expenses; while

Debtor stated he had prepared a similar document for 2013, he claimed he no longer possessed the same.

6. The Debtor reported income on his 2013 income tax return of \$58,933, yet claimed payment of monthly expenses which exceeded that amount.

7. Debtor paid personal expenses out of his law firm accounts, including private school tuition for his children, and in 2014, approximately \$20,000 to the attorney representing him in the current Adversary Proceeding.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Objection, then five (5) business days prior to the hearing, you or your attorney must:

File a written response with the Bankruptcy Court. Unless a written response is filed and served prior to the hearing, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it within the five (5) day deadline stated above. You must also mail a copy to the persons listed below.

Attend the hearing scheduled for **April 22, 2015 at 9:30 a.m.**, Courtroom I, 2nd Floor, United States Bankruptcy Court, 200 S. Washington Street, Alexandria, Virginia. If no timely response has been filed opposing the relief requested, the Court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

.Robert L. Vaughn, Jr., Esq.
O'Connor & Vaughn LLC
11490 Commerce Park Drive, Suite 510
Reston, Virginia 20191

Robert R. Weed, Esq.
45575 Shepard Drive, #201
Sterling, VA 20164

Thomas P. Gorman, Trustee
300 North Washington Street
Alexandria, VA 22314

Clerk of the Court
United States Bankruptcy Court
200 South Washington Street
Alexandria, VA 22314

Bernard J. DiMuro
1101 King Street, Suite 610
Alexandria, Virginia 22314

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief without holding a hearing.

Date: April 15, 2015.

O'Connor & Vaughn LLC
11490 Commerce Park Drive, #510
Reston, Virginia 20191
703-689-2100

By /s/ Robert L. Vaughn, Jr.
Robert L. Vaughn, Jr., VSB 20633

Certificate of Service

I hereby certify that on April 15, 2015, I caused a true copy of this Objection and Notice of Hearing to be served on all parties of record via the Court's ECF filing system.

/s/ Robert L. Vaughn, Jr.
Robert L. Vaughn, Jr.